

Bradford J. Sandler (NY Bar No. 4499877)
Ilan D. Scharf, Esq. (NY Bar No. 4042107)
Jason S. Pomerantz, Esq. (CA Bar No. 157216)
PACHULSKI STANG ZIEHL & JONES LLP
780 Third Avenue, 34th Floor
New York, New York 10017
Telephone: (212) 561-7700
Facsimile: (212) 561-7777

Counsel to Plaintiff RDC Liquidating Trust

**UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF NEW YORK**

In re: ROCHESTER DRUG CO-OPERATIVE, INC. Debtor.	Chapter 11 Case No. 20-20230 (PRW)
Advisory Trust Group, LLC, as trustee of the RDC LIQUIDATING TRUST, Plaintiff, v. BEIERSDORF, INC., Defendant.	Adv. Proc. No. 22-02009-PRW

THIRD STIPULATION EXTENDING TIME TO ANSWER COMPLAINT

Plaintiff, RDC Liquidating Trust, through its trustee Advisory Trust Group, LLC (“Plaintiff” or the “RDC Liquidating Trust”), successor in interest to Rochester Drug Co-Operative, Inc. (“Debtor”), and defendant Beiersdorf, Inc. (“Defendant” and, together with Plaintiff, the “Parties”), by and through their undersigned attorneys, hereby stipulate and agree:

WHEREAS, on February 3, 2022, Plaintiff filed a complaint (the “Complaint”) against Defendant;

WHEREAS, the summons (the “Summons”) was issued on February 4, 2022;
WHEREAS, on February 4, 2022, Defendant was served with the Summons and Complaint;
and

WHEREAS, on March 3, 2022, the Parties entered into a stipulation (the “First Stipulation”)
by which the time required for Defendant to answer the Complaint was extended through and
including April 15, 2022. The First Stipulation was approved by order entered March 4, 2022.

WHEREAS, on April 11, 2022, the Parties entered into a stipulation (the “Second
Stipulation”) by which the time required for Defendant to answer the Complaint was further
extended through and including June 15, 2022. The Second Stipulation was approved by order
entered April 12, 2022.

The Parties hereby stipulate and agree to the matters set forth below:

1. The Parties continue to negotiate and exchange information and have agreed, subject
to Court approval, to further extend the time for the Defendant to answer the Complaint to and
including July 29, 2022.

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2. All other terms set forth in the First Stipulation and Second Stipulation remain in full force and effect.

Dated: June 29, 2022

PACHULSKI STANG ZIEHL & JONES LLP

/s/ Ilan D. Scharf

Ilan D. Scharf (NY Bar No. 4042107)
Jason S. Pomerantz (CA Bar No. 157216)
780 Third Avenue, 34th Floor
New York, NY 10017
Telephone: (212) 561-7700
Email: ischarf@pszjlaw.com
jspomerantz@pszjlaw.com

Counsel to Plaintiff RDC Liquidating Trust

SO ORDERED:

DATED: _____, 2022
Rochester, New York

Dated: June 28, 2022

ALSTON & BIRD LLP

Andrew T. Frisoli
Andrew T. Frisoli (NY Bar No. 5902226)
90 Park Avenue
New York, NY 10016
Telephone: (212) 210-9553
Email: Andrew.Frisoli@alston.com

Counsel to Defendant Beiersdorf, Inc.

HON. PAUL R. WARREN
United States Bankruptcy Judge